

IMPORTANT LEGAL MATERIALS



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UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF FLORIDA

If you were employed by The Jerome Golden Center for Behavioral Health, Inc. and were terminated as a result of a mass layoff or plant closing without cause and without required notice in or around October 2019, you could get a payment from a class action settlement.

A court authorized this notice. This is not a solicitation from a lawyer.

- Former employees sued The Jerome Golden Center for Behavioral Health, Inc. (“The Jerome Golden Center”), claiming it violated federal law in conducting a mass layoff of employees without providing employees the required notice under the Worker Adjustment and Retraining Notification Act, 29 U.S.C. §2101 et seq. (“WARN Act”).
- All former employees of The Jerome Golden Center who were not given a minimum of 60 days’ written notice of termination and whose employment was terminated during any 90-day period surrounding October 8, 2019 as a result of a “mass layoff” or “plant closing” as defined by the Worker Adjustment and Retraining Notification Act of 1988 were previously determined to be part of the class.
- A settlement will provide \$400,000 to pay WARN Act claims of former employees.
- The two sides disagree on how much money the former employees could have recovered if they won at trial but the settlement is all of the money remaining at The Jerome Golden Center.
- Your legal rights are affected, and you have a choice to make now:

YOUR LEGAL RIGHTS AND OPTIONS IN THIS LAWSUIT	
Do Nothing	Stay in this lawsuit. Receive Money. By doing nothing, you will receive a portion of the money that is coming from the settlement.
Object	Write to the Court about why you don’t like the settlement
Go to a Hearing	Ask to speak in Court about the fairness of the settlement.

- These rights and options—and the deadlines to exercise them—are explained in this notice.
- The Court in charge of this case still has to decide whether to approve the settlement. Payments will be made if the Court approves the settlement and after appeals are resolved. Please be patient.

Any questions? Read on and visit <https://jeromegoldenlawsuit.com/>.

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BASIC INFORMATION

1. Why did I get this notice?

The Jerome Golden Center's records show that you were terminated or laid off without cause from your employment at The Jerome Golden Center on or about October 8, 2019, or within 90 days of October 8, 2019, as part of the mass layoff (or plant closing). The Court has previously allowed, or "certified," a class action lawsuit.

The Court sent you this notice because you have a right to know about a proposed settlement of the class action lawsuit, and about all of your options, before the Court decides whether to approve the settlement. If the Court approves it, and after objections and appeals are resolved, an administrator appointed by the Court will make the payments that the settlement allows.

This package explains the lawsuit, the settlement, your legal rights, what benefits are available, who is eligible for them, and how to get them.

Judge Bruce Reinhart of the United States District Court for the Southern District of Florida is overseeing this class action. The lawsuit is known as *Joyce Jones and Margaret Schnitzer v. The Jerome Golden Center for Behavioral Health, Inc.* Case No: 9:19-cv-81422-RLR.

2. What is this lawsuit about?

This lawsuit is about whether The Jerome Golden Center violated the WARN Act when it terminated a group of employees. You can find more information about the WARN Act at www.doleta.gov/layoff/warn.cfm.

3. What is a class action and who is involved?

In a class action lawsuit, one or more people called "Class Representatives" (in this case Joyce Jones and Margaret Schnitzer) sued on behalf of other people who have similar claims. The people together are a "Class" or "Class Members." The employees who sued—and all the Class Members like them—are called the Plaintiffs. The company they sued (in this case The Jerome Golden Center for Behavioral Health, Inc.) is called the Defendant. One court resolves the issues for everyone in the Class—except for those people who choose to exclude themselves from the Class.

4. Why is there a settlement?

The Court did not decide in favor of Plaintiffs or Defendants. The Plaintiffs think they could have won sixty-days' pay and benefits for each class member. The Defendant thinks that the Plaintiffs would not have won anything from a trial. But there was no trial. Instead, both sides agreed to a settlement that involves The Jerome Golden Center paying virtually all of its remaining funds to the Plaintiffs. The Class Representatives and the attorneys think settlement is best for all Class Members.

WHO IS IN THE SETTLEMENT

You need to decide whether you are affected by this lawsuit.

5. Am I part of this settlement?

The Court decided that the Class is all former employees of The Jerome Golden Center for Behavioral Health, Inc. who were not given a minimum of 60 days' written notice of termination and whose employment was terminated during any 90-day period surrounding October 8, 2019 as a result of a "mass layoff" or "plant closing" as defined by the Worker Adjustment and Retraining Notification Act of 1988.

You are not a part of the settlement if you previously excluded yourself from the Class.

6. I'm still not sure if I am included.

If you are still not sure whether you are included, you can get free help at <https://jeromegoldenlawsuit.com/> or by calling or writing the phone number or address listed in question 17.

THE SETTLEMENT BENEFITS—WHAT YOU GET

7. What does this settlement provide?

The Jerome Golden Center has agreed to create a \$400,000 fund to be divided among all Class Members, to pay the lawyers, and to pay the expenses of this lawsuit.

8. How much will my payment be?

Your share of the fund will depend upon what your compensation was during the period immediately prior to your termination. You will receive a pro-rata portion of the 60 days' wages.

HOW YOU GET A PAYMENT

9. How do I get a payment?

To qualify for payment, you do not need to do anything.

10. When would I get my payment?

The Court will hold a hearing on August 31, 2021 to decide whether to approve the settlement. If Judge Reinhart approves the settlement, there may be appeals. It's always uncertain whether these appeals can be resolved, and resolving them can take time, perhaps more than a year. In addition, it will take time to receive the money that will be available to pay the former employees. Please be patient.

THE LAWYERS REPRESENTING YOU

11. Do I have a lawyer in this case?

The Court decided that the law firm of Kwall Barack Nadeau PLLC of Clearwater, FL is qualified to represent you and all Class Members. They are called "Class Counsel." If you want to be represented by your own lawyer, you may hire one at your own expense.

12. How will the lawyers be paid?

Class Counsel has asked the Court to approve payment of one-third of the funds received by the Settlement Fund to them for attorneys' fees and reimbursement for \$14,245.95 in costs. The fees would pay Class Counsel for investigating the facts, litigating the case, negotiating the settlement and reimbursing them for their expenses.

The costs for administering the Settlement Fund will be paid out of the Settlement Fund.

OBJECTING TO THE SETTLEMENT

You can tell the Court that you don't agree with the settlement or some part of it.

13. How do I tell the Court that I don't like the settlement?

If you're a Class Member, you can object to the settlement if you don't like any part of it. You can give reasons why you think the Court should not approve it. The Court will consider your views. To object, you must send a letter saying that you object to Jerome Golden Center Employee Class Settlement. Be sure to include your name, address, telephone number, your signature, and the reasons you object to the settlement. Your objection must be received no later than August 24, 2021 by the following three entities:

Clerk of the Court
Paul G. Rogers Federal Bldg.
and U.S. Courthouse
701 Clematis St., Room 202
West Palm Beach, FL 33401

Class Counsel
Ryan D. Barack
Michell Erin Nadeau
Kwall Barack Nadeau PLLC
304 S. Belcher Rd., Ste. C
Clearwater, FL 33765

Employer's Counsel
Lisa M. Munoz
Hall Booth Smith, P.C.
1400 Centrepark Boulevard,
Suite 400
West Palm Beach, FL 33401

QUESTIONS? VISIT WWW.JEROMEGOLDENLAWSUIT.COM

THE COURT'S FAIRNESS HEARING

The Court will hold a hearing to decide whether to approve the settlement. You may attend and you may ask to speak, but you don't have to.

14. When and where will the Court decide whether to approve the settlement?

The Court will hold a Fairness Hearing at 2 p.m. on August 31, 2021 at the United States District Court for the Southern District of Florida, via telephone using the following conference call instructions: Dial 1-888-557-8511; Enter access code 4098267#; and Enter security code 1234#. At this hearing the Court will consider whether the settlement is fair, reasonable, and adequate. If there are objections, the Court will consider them. Judge Reinhart will listen to people who have asked to speak at the hearing. The Court may also decide how much to pay to Class Counsel. After the hearing, the Court will decide whether to approve the settlement. We do not know how long these decisions will take.

15. Do I have to come to the hearing?

No. Class Counsel will answer questions Judge Reinhart may have. But, you are welcome to come at your own expense. If you send an objection, you don't have to come to Court to talk about it. As long as you mailed your written objection on time, the Court will consider it. You may also pay your own lawyer to attend, but it's not necessary.

16. May I speak at the hearing?

You may ask the Court for permission to speak at the Fairness Hearing. To do so, you must send a letter saying that in a "Notice of Intention to Appear in The Jerome Golden Employee Class Settlement." Be sure to include your name, address, telephone number, and your signature. Your Notice of Intention to Appear must be received no later than August 24, 2021, and be sent to the Clerk of the Court, Class Counsel, and Defendant's Counsel, at the three addresses in question 13.

GETTING MORE INFORMATION

17. Are more details available?

Visit the website, <https://jeromegoldenlawsuit.com/>, where you will find the Court's Order Certifying the Class, the Complaints that the Plaintiffs submitted, and the Answers the Defendant filed. You may ask questions by calling 727-441-4947 or by writing to: Kwall Barack Nadeau PLLC, 304 S. Belcher Rd, Suite C, Clearwater, FL 33765.

DATE: July 28, 2021

